

## UNITED STATES DISTRICT COURT

for the

Northern District of California



FILED

Jul 01 2024

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

United States of America

v.

Jaray Washington,

Case No. 24-mj-71001-MAG

SEALED CASE

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 2, 2024 in the county of Alameda in the  
Northern District of California, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 1951(a)

Robbery affecting interstate commerce

Maximum penalties:

20 years imprisonment; \$250,000 fine; 3 years supervised release; restitution;  
\$100 special assessment; forfeiture

This criminal complaint is based on these facts:

See attached affidavit of Federal Bureau of Investigation Special Agent Jason Brissey

☒ Continued on the attached sheet.Approved as to form: /s/ Jonah P. Ross  
AUSA JONAH P. ROSS/s/ Jason Brissey  
*Complainant's signature*Jason Brissey, FBI Special Agent  
*Printed name and title*Attested to by the applicant in accordance with the requirements of  
Fed. R. Crim. P. 4.1 by telephone.Date: July 1, 2024City and state: Oakland, CaliforniaKandis Westmore  
*Judge's signature*Hon. Kandis A. Westmore, U.S. Magistrate Judge  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Jason Brissey, Special Agent of the Federal Bureau of Investigation, being duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I make this affidavit in support of an application under Rule 4 of the Federal Rules of Criminal Procedure for a criminal complaint and arrest warrant authorizing the arrest of Jaray WASHINGTON (“WASHINGTON”) for robbery affecting interstate commerce in violation of Title 18, United States Code, Section 1951 on or about February 2, 2024, in the Northern District of California.

**SOURCES OF INFORMATION**

2. This affidavit is submitted for the limited purpose of securing a criminal complaint and arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts necessary to establish probable cause that a violation of the federal law identified above has occurred. Further, my understanding of the significance of certain events and facts may change as the investigation progresses.

3. I have based my statements in this affidavit on my training and experience as a Federal Bureau of Investigation Special Agent, personal knowledge of the facts and circumstances obtained through my participation in this investigation, information provided by other agents and law enforcement officers, information provided by reports of other law enforcement officers, information provided by photographic evidence, and information provided by records and databases. I believe these sources to be reliable. Where I refer to conversations and events, I often refer to them in substance and in relevant part rather than in their entirety or verbatim, unless otherwise noted. This affidavit also reflects my current understanding of facts relating to this investigation, but my understanding may change in the future as the investigation proceeds.

**AFFIANT BACKGROUND**

4. I am a Special Agent of the Federal Bureau of Investigation (“FBI”) and have been so employed since November of 2006. Currently I am assigned to the Violent Crimes and Major Offender Squad at the Oakland Resident Agency, San Francisco Field Office.

5. As part of my training to become a Special Agent, I received approximately 16 weeks of instruction at the FBI Academy. Since graduating from the Academy, I have received further training regarding federal and state laws and investigative techniques relating to criminal street gangs, criminal enterprises, human intelligence, wire, electronic, and physical surveillance, cold case investigations, narcotics trafficking investigations, human trafficking investigations, and firearms investigations.

6. I am currently assigned to a squad that investigates violent crime in the Bay Area and in particular Alameda County. During my career as an FBI Special Agent, I have participated in various violent crime investigations including narcotics trafficking, firearms-related offenses, murder for hire, fugitive, robbery, child exploitation, and gang investigations. During these investigations, I have utilized, or participated in investigations that utilized, various types of investigative techniques, including the use of confidential human sources, consensual recording, controlled purchases of firearms and narcotics; financial analysis, garbage searches, Global Positioning System tracking, investigative interviews, physical surveillance, records research, telephone toll analysis, and the service of Grand Jury subpoenas. I have participated in the execution of numerous state and federal arrest warrants and search warrants related to illegal activities involving commercial robberies that resulted in the seizure of cellular devices containing evidence of the robberies. My training and experience have given me an understanding of how people who commit violent offenses, including those who commit robberies, use the cellular devices, the Internet, and social media to facilitate and commit those offenses.

7. As a federal agent, I am authorized to investigate violations of laws of the United States and am a law enforcement officer with the authority to execute warrants issued under the

authority of the United States.

**APPLICABLE STATUTES**

8. The elements of Hobbs Act robbery (18 U.S.C. § 1951(a)) are as follows: (1) the defendant knowingly obtained money or property from or in the presence of the victim; (2) the defendant did so by force or fear; (3) the defendant believed that the victim parted with the money or property because of the robbery; and (4) the robbery affected interstate commerce.

**STATEMENT OF PROBABLE CAUSE**

9. From January 14, 2024 to February 2, 2024, Jaray WASHINGTON committed eight armed robberies at businesses in Alameda County in the Northern District of California. WASHINGTON, who used a pistol with a distinct purple lower in each of the robberies, was ultimately identified by a combination of—among other evidence—his possession of the pistol with purple lower, which officers located following his arrest; Instagram posts showing his possession of the same pistol; historical cell phone location data placing WASHINGTON's phone near the scene of many of the robberies at the time they occurred and along the path of two car chases with police; distinct clothing found during the search of his residence that matches clothing worn during some of the robberies; a distinct red and black cross-body bag that was used during several of the robberies (but not ultimately recovered); and his use during some of the robberies of a Chevrolet Silverado pickup truck from U-Haul, which was rented by WASHINGTON's mother while WASHINGTON was present, and which officers saw WASHINGTON enter and drive. WASHINGTON was arrested on a state arrest warrant on February 13, 2024.

**January 14, 2024 (8:23 a.m.) Armed Robbery at Valero Gas Station in Hayward**

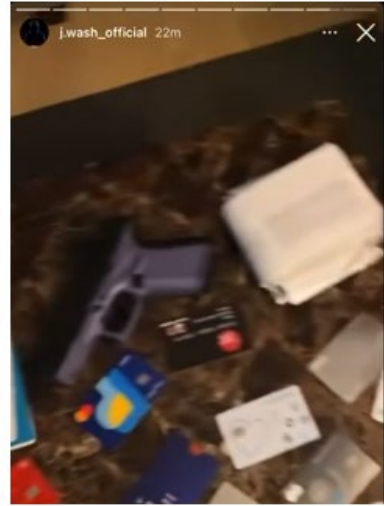
10. On or about January 14, 2024, at around 8:23 a.m., WASHINGTON entered the Valero gas station snack shop, located at 26978 Hesperian Boulevard in Hayward, CA. WASHINGTON pointed a pistol with a purple lower at the store clerk and demanded money from the register. WASHINGTON racked the pistol's slide—which returned to its original forward position, indicating the pistol was loaded with ammunition—and walked behind the

counter and struck the store clerk in the back of the head with an open hand. The store clerk removed cash from the register and gave it to WASHINGTON. WASHINGTON then demanded money from the safe located behind the counter. The store clerk placed the cash inside a plastic bag and handed it to WASHINGTON. WASHINGTON then fled the store on foot, headed northbound and around the corner.

11. Surveillance video captured the robbery, including the pistol with purple lower and a black and red cross-body bag:



12. A few weeks earlier, a probation officer who was also attached to the United States Marshals Service task force located a public Instagram account for WASHINGTON (“j.wash\_official”). (At the time, WASHINGTON had a warrant for a violation of the terms of his federal supervised release.) The probation officer had screen-captured a video reel posted by WASHINGTON on January 11, 2024, first showing WASHINGTON’s face and then showing a table covered in checks, California IDs and driver’s licenses, banks cards, and social security cards (which all appear to be for other people). The same video showed a pistol with purple lower, which appeared consistent with the pistol WASHINGTON used during the January 14, 2024 robbery:



13. On February 13, 2024, officers arrested WASHINGTON at his mother's residence in Oakland, CA, where officers learned WASHINGTON had been residing. Officers searched the residence and located a loaded Glock pistol with purple lower, which appeared consistent with the pistol used in the January 14, 2024 robbery:



14. Through prior investigation, detectives had identified a phone number ending in 7170 as belonging to WASHINGTON and had authored and obtained a search warrant for call



detail records (“CDRs”—which showed the location of the phone in the past by recording with which cell towers it had communicated) and geo-location data (which showed the phone’s current general location) for that phone. An analyst with the Hayward Police Department reviewed the search warrant returns, and determined that on January 14, 2024, between 8:02:02 a.m. and 8:06:50 a.m., the phone traveled westbound along the Jackson Street/Highway 92 corridor to the area of Hesperian Boulevard in Hayward, within one block of the Valero gas station at which the robbery occurred. Between 8:06:40 a.m. and 8:18:18 a.m., the phone was in the immediate area of the Valero. Between 8:21:45 a.m. and 8:24:54 a.m. (covering the time of the robbery), the phone remained in the immediate area of the Valero. Between 8:25 a.m. and 8:27 a.m., the phone left the area and traveled along the eastbound Highway 92 corridor.

15. During his arrest on February 13, 2024, officers located on WASHINGTON’s person the phone associated with the phone number ending in 7170.

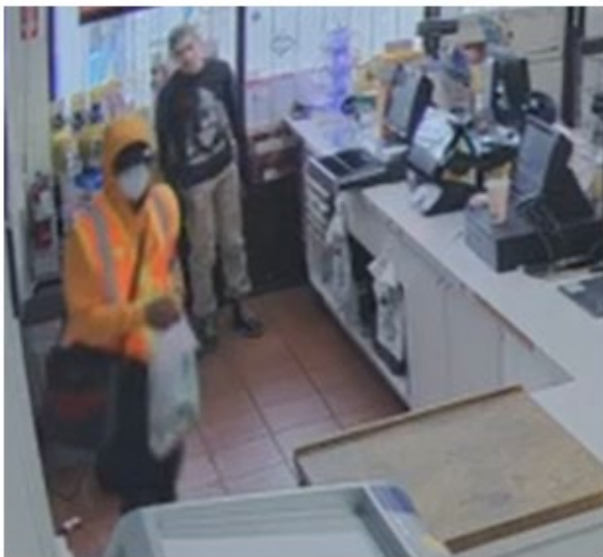
**January 19, 2024 (10:30 a.m.) Armed Robbery at Valero Gas Station in San Leandro**

16. On or about January 19, 2024, at around 10:30 a.m., WASHINGTON entered the snack shop of the Valero gas station located at 1401 Grand Avenue in San Leandro, CA. WASHINGTON (who was wearing a bright orange sweatshirt, black baseball-style cap, orange construction-style vest, black pants, black New Balance sneakers, and a black and red cross-body bag) removed a pistol with purple lower from the black and red bag and racked the pistol’s slide—which returned to its original forward position, indicating the pistol was loaded with ammunition.

17. WASHINGTON pointed the pistol at the store clerk, who—having been the victim of prior robberies—immediately recognized that a robbery was occurring and opened the store’s cash register. WASHINGTON took cash from the register as well as approximately 80 packs of Newport and Camel cigarettes. WASHINGTON grabbed the store’s landline phone and told the store clerk to give him her cell phone, which she then accidentally dropped in the store’s trash can. WASHINGTON told her not to follow him, and he fled.

18. Surveillance video from inside and outside the store captured the incident,

WASHINGTON's appearance, a red and black cross-body bag, and the pistol with purple slide, which appeared consistent with the pistol ultimately recovered from WASHINGTON's residence:



19. The analyst from the Hayward Police Department analyzed the CDRs for the phone number ending 7170 and determined that, at 10:02 a.m., the records showed WASHINGTON's phone in Oakland, CA. At 10:06 a.m., his phone appeared to travel along eastbound I-580 and arrived in San Leandro at about 10:12 a.m. It remained in the area of 1401



Grand Avenue (the Valero gas station) from 10:12 a.m. until 10:31 a.m. (covering the time of the robbery), and then traveled westbound on I-580 back toward Oakland.

**January 22, 2024 (8:26 a.m.) Armed Robbery at Valero Gas Station in Hayward**

20. Shortly before 8:30 a.m. on January 22, 2024, WASHINGTON, wearing a yellow or orange hooded sweatshirt, an orange construction vest, a black baseball-style cap, black pants, black sneakers, and a black and red cross-body bag) entered the Food Shop at the Valero gas station at 193 Winton Avenue in Hayward, CA. WASHINGTON approached the cash register and pointed a pistol (described by the store clerk as grey but appearing on surveillance footage to have a purple lower) at the store clerk and demanded cash from the register and cigarettes. Out of fear, the clerk gave the suspect over \$300 in cash and over \$750 in cigarettes.

WASHINGTON then ordered the store clerk to give him her iPhone, which she did.

21. WASHINGTON then walked over to a store customer, pointed the pistol at her, and stated, “Give me everything you got.” WASHINGTON then took the customer’s gold chain, four silver rings, wallet (containing ID and debit cards), and iPhone.

22. Another customer then entered the store. WASHINGTON, holding the pistol, told the customer to go to the other side of the store, and she complied.

23. Surveillance footage captured the incident, including WASHINGTON’s appearance, the red and black cross-body bag, and what appeared to be (although the footage is low quality) a pistol consistent with the pistol ultimately recovered from WASHINGTON’s residence:





24. The analyst from the Hayward Police Department analyzed the CDRs for the

phone number ending 7170 and determined that, at 7:30 a.m. on January 22, 2024, the phone was in the area of I-880 in San Leandro. Between 7:31 and 7:35 a.m., the phone traveled southbound along I-880, and between 7:37 a.m. and 7:42 a.m., the phone traveled to and then arrived in the area of the Valero located at 193 Winton Avenue in Hayward, CA. Between 8:24 a.m. and 8:28 a.m. (when the robbery occurred), the phone remained in the area of the Valero. At 8:29 a.m., the phone began to move north, eventually appearing to travel north on I-880 and out of Hayward.

**January 27, 2024 (8:54 p.m.) Armed Robbery at Quik Stop Gas Station in Fremont, CA**

25. On or about January 27, 2024, at around 8:54 p.m., WASHINGTON entered the Quik Stop gas station's snack shop, located at 38995 Farwell Drive in Fremont, CA, and pulled a pistol with a purple lower from his waistband. WASHINGTON racked the pistol's slide—which returned to its original forward position, indicating the pistol was loaded with ammunition. WASHINGTON told the store clerk to open the cash registers and repeatedly told the store clerk he would kill him. WASHINGTON walked behind the counter and took the store clerk's wallet out of his pocket. Out of fear, the clerk opened both cash registers, and WASHINGTON took cash from both. WASHINGTON also took cigarettes and bottles of Hennessy liquor, which he loaded into his backpack. WASHINGTON then took the store clerk's Apple iPhone.

26. After WASHINGTON left, the store clerk went to lock the front door. While he was locking the door, the clerk believed he saw WASHINGTON enter a white sedan parked on Farwell Place and drive towards Mowry.

27. Surveillance video captured the incident, as well as WASHINGTON's appearance

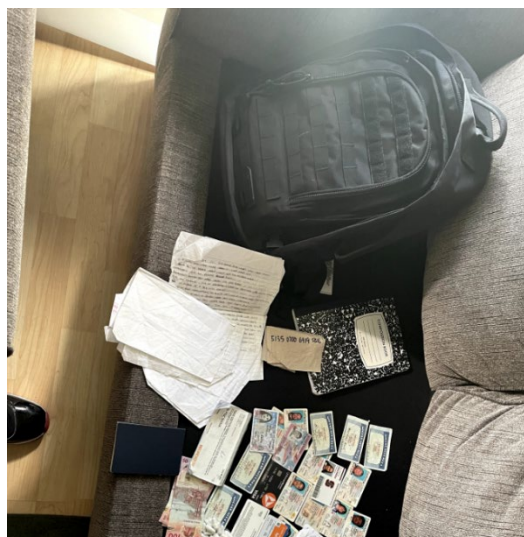


and his use of a pistol with purple lower:





28. During the eventual search of WASHINGTON's residence on February 13, 2024, investigators observed a backpack consistent with the backpack used by WASHINGTON during the January 27, 2024 robbery:



29. Investigators from the Fremont Police Department reviewed surveillance cameras located on Farwell Place, which captured WASHINGTON running northbound on Farwell Drive away from the store following the robbery. WASHINGTON ran out of the camera's frame, and shortly after a white Chevrolet Silverado with U-Haul markings could be seen headed southbound toward Mowry Place. By viewing other surveillance cameras capturing the same vehicle, investigators confirmed the license plate of the Silverado with U-Haul markings (the "U-Haul Truck") had Arizona license plates with license number AM27790. License plate reading cameras showed the U-Haul Truck traveling eastbound on Mowry Boulevard from I-880 at 8:31 p.m. Surveillance cameras showed the U-Haul Truck appearing to



case the Quik Stop by driving back and forth twice in front of the store. The U-Haul Truck is last seen on Farwell Drive just north of Farwell Place at 8:44 p.m. before going out of frame.

30. Surveillance video then showed WASHINGTON walking southbound on Farwell Drive and crossing Farwell Place at 8:54 p.m. and then running northbound on Farwell Drive crossing Farwell Place at 8:57 p.m. (after the robbery is completed). Surveillance then showed the U-Haul Truck traveling southbound on Farwell Place and then heading to I-880 northbound at 8:58 p.m.

31. The following image shows the U-Haul Truck as seen on surveillance:



32. Investigators with the Fremont Police Department then authored and obtained a search warrant served for records and surveillance video related to the U-Haul Truck rental from U-Haul. The records received from U-Haul established that, three hours before the January 27, 2024 robbery, the U-Haul Truck was rented by a woman with initials J.L.C. (hereafter J.L.C.) in San Pablo, CA. The rental agreement lists the additional contact of “Anthony Watson” with phone number ending in 7170.

33. U-Haul also provided surveillance footage from the time of the rental. The footage shows J.L.C. with a man standing next to her. The man is wearing what appears to be

the same sweatshirt and hat as the suspect in the robbery that occurred three hours later:



34. Investigators researched J.L.C. and learned that she had only ever contacted one person at Santa Rita Jail: WASHINGTON. The investigators determined that J.L.C. was WASHINGTON's mother.

35. The investigators identified multiple public Instagram accounts associated with WASHINGTON, and the phone number associated with at least one of the accounts was the number ending in 7170—the same number provided to U-Haul for “Anthony Watson.” (Investigators conducted a records check on the phone number, which indicated the registrant had provided the name “Mike Adams” to the service provider, T-Mobile.)

36. CDRs for 7170 indicated that the phone was in the area of the U-Haul rental location at the time (5:42 p.m.) the U-Haul Truck was rented.

37. The returns also indicated that the phone entered Fremont on January 27, 2024 at around 8:30 p.m. and was near the intersection of Mowry and Farwell (the location of the robbery). The phone remained in the area from 8:31 to 8:59 p.m., and then began to move north.

38. The CDRs show four calls to the U-Haul rental location, occurring between January 27 and January 31, 2024. The CDRs also show over 600 communications with a phone number ending in 0902, the number investigators learned was associated with J.L.C.

39. On February 1, 2024, investigators authored and obtained a search warrant

permitting the placement of a GPS tracking device on the U-Haul Truck. The same day, investigators conducted surveillance at J.L.C.'s residence in Oakland, where, at around 8:00 p.m., they observed the U-Haul Truck arrive and park on the street. The geo-location data for the phone ending in 7170 indicated the phone was in the area at the time. At 8:09 p.m., the U-Haul Truck drove away, but the investigators could not see the driver.

40. Using the geo-location data for the phone ending in 7170, at 9:21 p.m. that night, investigators located the U-Haul Truck in the parking lot of the Oaks Card Club at 4097 San Pablo Avenue in Emeryville, CA. An investigator attached the GPS tracker to the U-Haul Truck.

41. An investigator entered the card club and saw WASHINGTON seated at one of the card tables, wearing a black and orange San Francisco Giants hat and an orange hooded sweatshirt underneath a black puff coat. Surveillance video retrieved from Oaks Card Club showed WASHINGTON as he appeared that night:







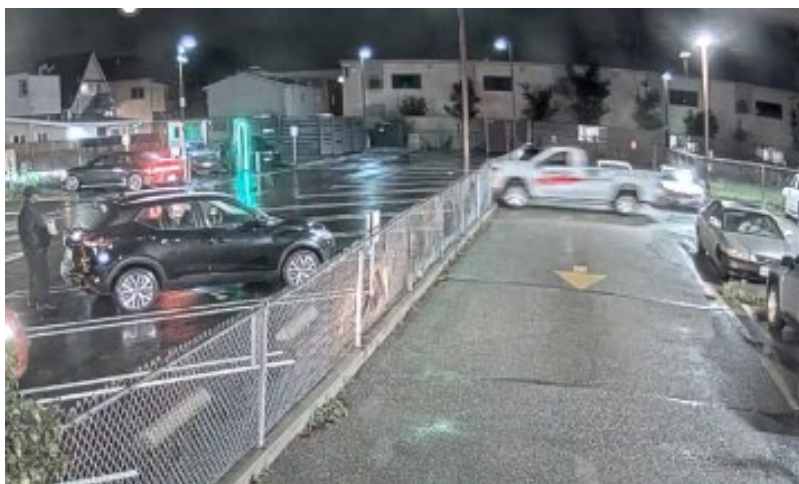
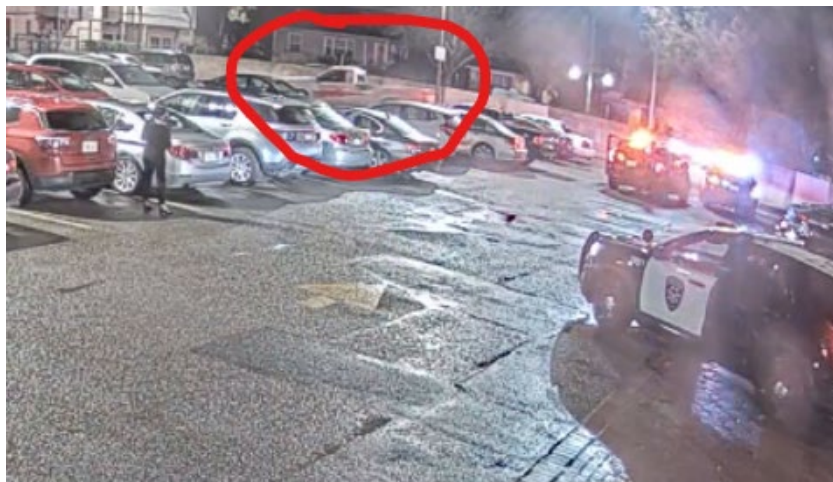
42. Following WASHINGTON's arrest on February 13, 2024, investigators located the same distinct orange sweatshirt in WASHINGTON's residence:



43. Investigators contacted the Emeryville Police Department to assist with the arrest of WASHINGTON at Oaks Card Club. They saw WASHINGTON leave the card club and enter the driver's seat of the U-Haul Truck. Emeryville Police Department officers—in marked police vehicles with red and blue lights flashing—attempted to detain WASHINGTON, but he rammed the U-Haul Truck into two Emeryville Police Department patrol cars, nearly struck an officer, hit

five parked civilian cars, hopped a median, and then ran over a fence to escape capture.

Surveillance video captured his escape:



44. Using the GPS tracker attached to the truck, the officers located the U-Haul Truck in Oakland.

**January 31, 2024 (6:50 a.m.) Armed Robbery at Exxon Gas Station in Livermore**

45. Around 6:50 a.m. on January 31, 2024, WASHINGTON (wearing a black hoodie, black mask over his face, and an orange construction vest) entered the Grab & Go Food Mart at the Exxon gas station located at 4700 First Street in Livermore, CA. WASHINGTON walked around the counter and pointed a firearm (described as black with a purple or blue handle) at the store clerk and stated, “Open the safe! Open the safe!” The store clerk told WASHINGTON he



did not have the key, and WASHINGTON demanded the clerk open the cash register.

WASHINGTON then searched the clerk's jacket and pants pockets, taking cash from the clerk's pocket.

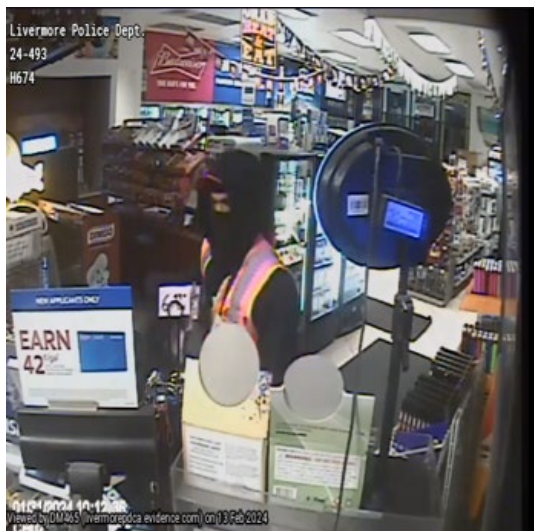
46. Several times, WASHINGTON shoved the clerk, who fell back against the counter. WASHINGTON grabbed two plastic bags from the counter and filled them with cigarette boxes, and then grabbed the clerk's tote bag and filled it with more cigarette boxes. WASHINGTON also stole the clerk's cell phone (which was on the counter) and some t-shirts from the store.

47. The clerk followed WASHINGTON as he left the store and saw WASHINGTON enter a U-Haul pickup truck, which was south of the Exxon, and drive away. The clerk could not observe a front license plate but saw the rear license plate was from Arizona and had a "7."

48. Around 6:54 a.m., another witness parked his truck at the gas pumps at the Exxon and was sitting in his truck with the windows rolled down when he saw WASHINGTON walk quickly out of the store. The witness then heard the clerk say WASHINGTON had stolen his phone. The witness exited his truck and walked toward the clerk, who was following WASHINGTON. The witness watched WASHINGTON walk behind bushes and then saw what he believed to be a Chevrolet Silverado U-Haul pickup truck drive into the southbound left turn lane of First Street and then make a U-turn at the traffic light.

49. Surveillance video from inside the Grab & Go Food Mart captured the incident, as

well as WASHINGTON's appearance:



50. Surveillance video from McDonald's at 4528 Las Positas Road (less than 0.1 miles from the Exxon) captured a white U-Haul truck entering the parking lot at 6:30 a.m. and 6:50 a.m. on January 31, 2024.

51. Surveillance video from the Chevron gas station located across the street from the Exxon captured a white U-Haul truck driving through the area multiple times between 6:30 a.m. and 6:50 a.m. The U-Haul truck then parked next to the Exxon, on the south side. At 6:54 a.m.,

a subject is seen running toward the U-Haul truck, which then leaves the area on First Street toward I-580.



52. After learning that a similar white U-Haul truck (with AZ license plate AM27790) had been used a few days earlier in a similar armed robbery in Fremont, investigators discovered that the white U-Haul truck with AZ license plates AM27790 was photographed by license plate reading cameras at First Street and I-580 eastbound offramp (approximately 400 feet from the Exxon) at 6:28 a.m. No other U-Haul rental vehicle was identified by the camera.

53. Call details records for the phone ending in 7170 placed the phone in Livermore on January 31, 2024 at 6:58 a.m. (four minutes after the U-Haul truck fled the Exxon) roughly 4.5 miles west of the Exxon. At that time, the user of the phone called the number associated with WASHINGTON's mother, J.L.C. Per the CDRs, the cell phone continued to move west on I-580.

**January 31, 2024 (11:40 a.m.) Armed Robbery at AM/PM in Castro Valley**

54. At 11:40 a.m. on January 31, 2024, WASHINGTON and a male accomplice arrived in a silver Honda Accord with temporary white dealer plates outside the AM/PM located at the Arco gas station at 2770 Castro Valley Boulevard in Castro Valley, CA. WASHINGTON (wearing a black hooded sweatshirt, an orange construction-style vest, black pants, black New Balance sneakers, and carrying a black and red cross-body bag) exited the Honda's driver's seat,

and his accomplice exited the front passenger seat. They entered the AM/PM, where three store clerks were working. WASHINGTON pulled out a pistol (which surveillance footage appeared to show had a purple lower, but the video was too grainy to see clearly) and racked the pistol's slide. The slide returned to its original forward position, indicating the pistol was loaded. WASHINGTON held the gun against one store clerk while pushing him against the counter. (The clerk described the gun as a black pistol similar to the reporting officer's service weapon. The clerk also stated that the gun appeared to have an orange tip, but surveillance video shows no orange tip.)

55. At the same time, WASHINGTON's accomplice walked behind the counter and demanded that the other clerks open the cash registers. They complied. The accomplice also took \$300 from one clerk's pocket.

56. WASHINGTON forced the first clerk behind the counter and told him to get on the ground. WASHINGTON and his accomplice then stole \$1,500 from the two cash registers and about 10 cartons of Marlboro cigarettes. WASHINGTON and his accomplice then returned to the silver Honda and fled.

57. Surveillance footage captured the suspects' arrival in a Honda Accord, the robbery inside the AM/PM, and their departure in the Honda Accord.



58. At 11:40 a.m., WASHINGTON and his accomplice arrived in the silver Honda Accord:



59. After entering, WASHINGTON grabbed one store clerk and held the pistol to his



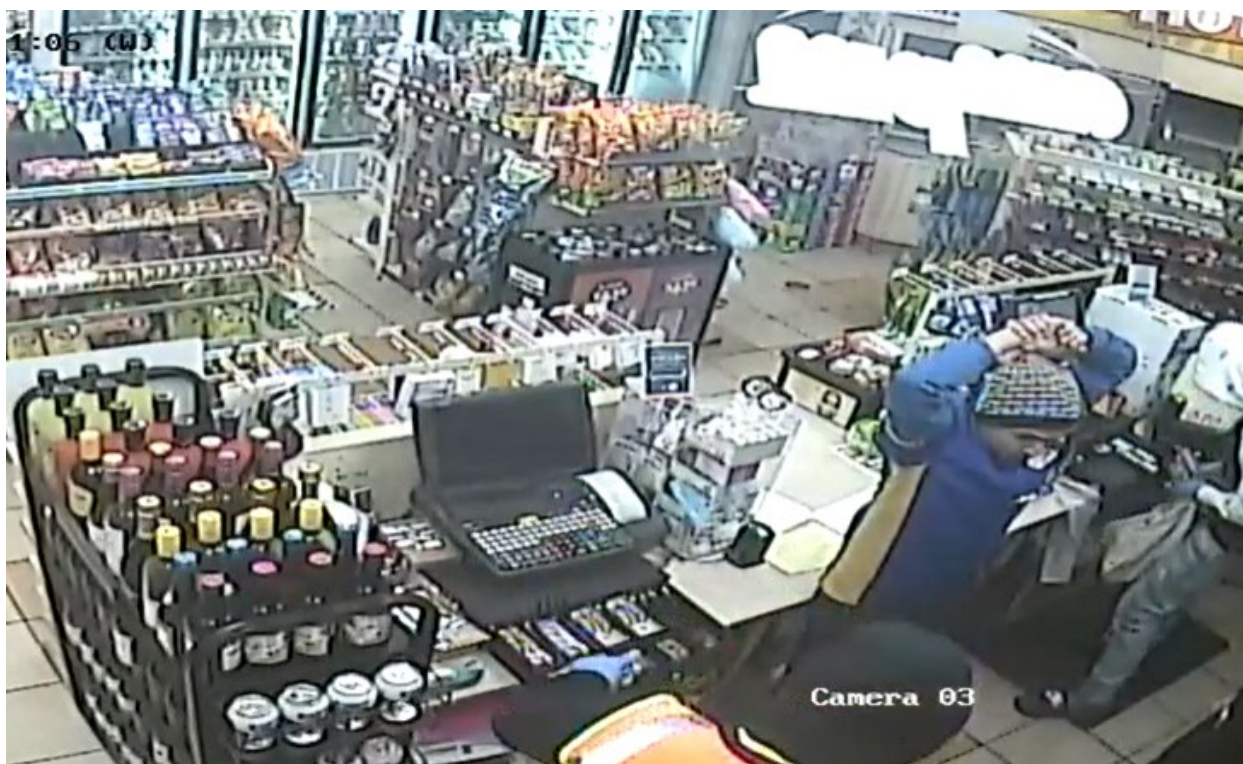
head. Although the video quality was low, it appeared to show a pistol consistent with the pistol with purple lower used by WASHINGTON in the other robberies:



60. WASHINGTON shoved two store clerks to the floor while holding the pistol:



61. WASHINGTON and his accomplice took cash from both registers before fleeing in the silver Honda Accord:



**February 1, 2024 (6:29 a.m.) Armed Robbery at Doubletime Gas Station in Hayward**

62. Around 6:30 a.m. on February 1, 2024, WASHINGTON (wearing a black jacket, black pants, black New Balance sneakers, and black balaclava mask) entered the Doubletime gas station's snack shop, located at 28250 Hesperian Boulevard in Hayward, CA. WASHINGTON



waved a pistol at the store clerk and demanded that she give him the money from the cash register and that she open the safe. She told him she could not open the safe, but she opened the cash register and handed over the cash tray, from which WASHINGTON took approximately \$200. He then filled a black garbage bag with 186 packs of cigarettes. WASHINGTON then opened the side door leading to the rear room and took the clerk's purse, which was sitting on top of the counter.

63. Before WASHINGTON left the store, he ordered the clerk to go to the back room and not to come out. The clerk complied out of fear and did not leave the room until she had heard WASHINGTON leave the store.

64. Surveillance video captured the incident<sup>1</sup>, including WASHINGTON's appearance. WASHINGTON entered the store wearing a black puff coat, approached the clerk and pointed a pistol at her:



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<sup>1</sup> The video system's clock was off by 12 hours, and indicated the incident took place at 6:29 p.m., instead of 6:29 a.m.

65. Although the video footage was grainy, the pistol appeared to have a purple lower:



66. WASHINGTON removed cash from the register while the store clerk filled the plastic bag with boxes of cigarettes:



67. WASHINGTON wore black New Balance sneakers, consistent with the sneakers he wore in several other robberies:



68. The CDRs for the phone number ending in 7170 indicated that, between 6:11 and 6:15 a.m. on February 1, 2024, the phone traveled to the area of the Doubletime gas station. Between 6:15 a.m. and 6:29 a.m. (when WASHINGTON entered the store), the phone continued to be in the area of the gas station. Between 6:31 a.m. and 6:34 a.m., the phone remained in the area. Between 6:34 a.m. and 6:40 a.m., the phone left the area, traveling toward Oakland.

**February 2, 2024 (7:04 a.m.) Armed Robbery at Taco Bell in Hayward**

69. At around 7:04 a.m. on February 2, 2024, WASHINGTON arrived with a male accomplice at the Taco Bell restaurant located at 21600 Foothill Boulevard in Hayward, CA. WASHINGTON (wearing an orange construction-style vest, black puff coat, black baseball-style cap, black balaclava, and black and grey Nike Airmax '95 sneakers) exited from the driver's seat of a silver Honda Accord, and his accomplice exited from the front passenger seat. WASHINGTON and his accomplice entered the Taco Bell, where two employees were setting up for the day. WASHINGTON approached one employee (Victim 1) and pressed a pistol with a purple lower against her back. WASHINGTON ordered Victim 1 to go to the back of the



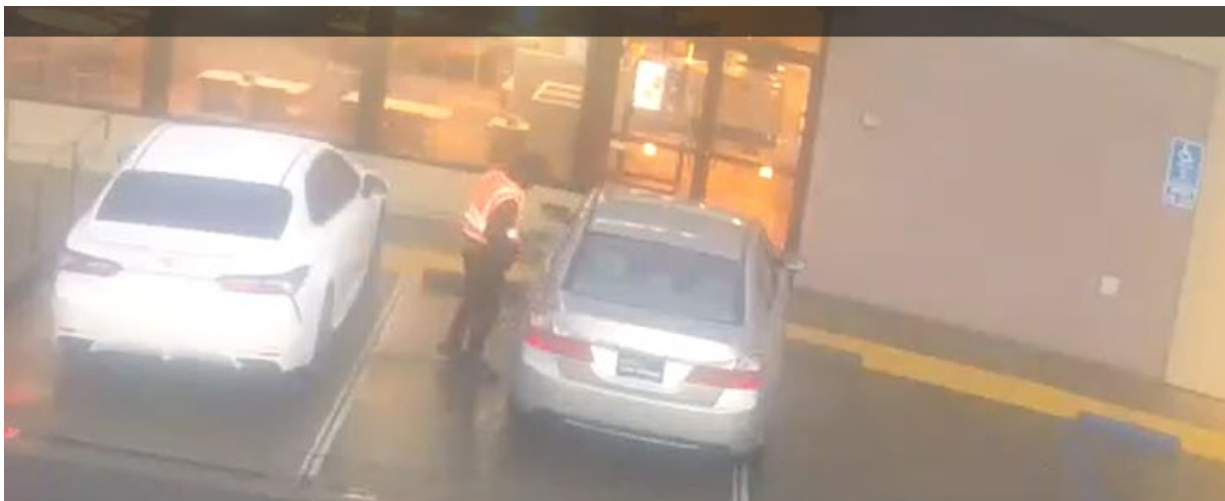
restaurant, and, fearing for her safety, she complied. While forcing Victim 1 to the back, WASHINGTON saw the other employee (Victim 2) and pointed the gun at her and ordered her to the back as well.

70. After forcing both employees into the rear office, WASHINGTON asked, “Where’s the safe?” and ordered the employees to “disconnect everything” and to remove all the money from the safe. Victim 2 informed WASHINGTON that the safe was in the front of the store. WASHINGTON told his accomplice to force Victim 2 to the front to open the safe. His accomplice walked Victim 2 to the safe, and Victim 2 input her passcode to unlock the safe. The accomplice placed the cash (\$1050 in mixed currency, including rolls of coins) into a bag. (Both victims recalled that the accomplice also possessed a pistol, but surveillance video indicates that he did not.)

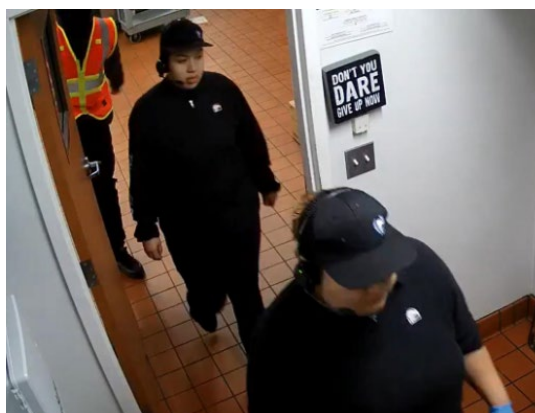
71. WASHINGTON remained in the office with Victim 1 and asked for her cell phone and wallet, but she informed him they were locked up. He then ordered her to take all valuables out of her backpack, and while she searched through her backpack, she felt the pistol pressed against her back. WASHINGTON then walked Victim 1 out of the office at gunpoint to where Victim 2 was taking money out of the safe. WASHINGTON then forced both victims back into the office and fled in the Honda Accord with his accomplice at around 7:06:40 a.m..

72. Surveillance video captured the incident, including WASHINGTON’s appearance and the pistol with purple lower.

73. WASHINGTON and his accomplice arrived in the silver Honda Accord with temporary paper plates with the word “Enterprise.”:



74. WASHINGTON and his accomplice forced the victims into the rear office. WASHINGTON held a pistol with purple lower:

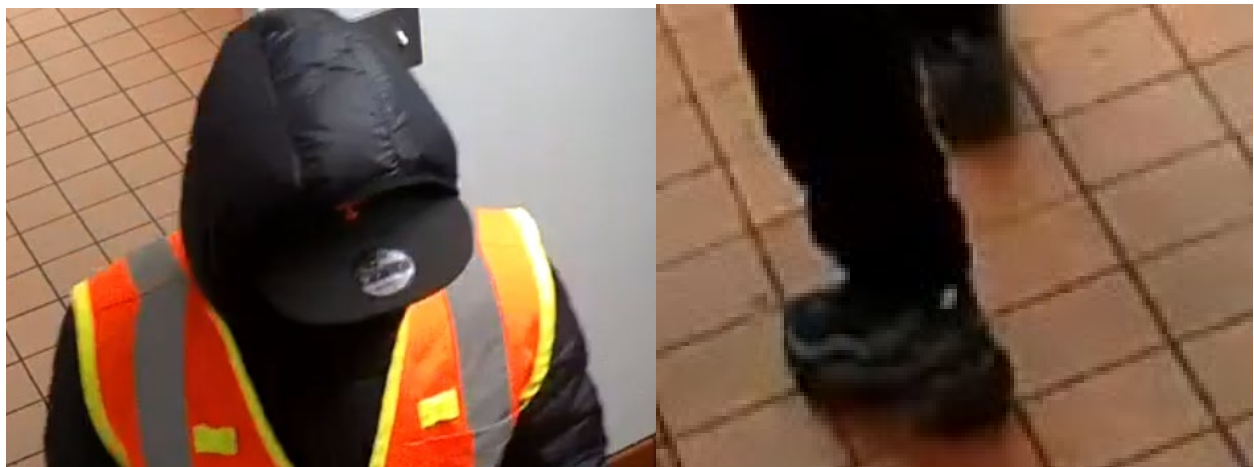


75. WASHINGTON's accomplice forced Victim 2 to open the safe and then took cash:



76. WASHINGTON then forced both victims back into the rear office before he and his accomplice fled in the silver Honda Accord.

77. WASHINGTON's baseball cap (which appeared to be a San Francisco Giants cap), puff coat, and sneakers matched the attire he wore the night before at the Oaks Card Club in Emeryville:







78. During the search of WASHINGTON's residence on February 13, 2024, investigators located Nike Airmax '95 sneakers, a black puff coat, and black balaclavas consistent with those worn by WASHINGTON during the robbery at Taco Bell:





79. A FLOCK license plate reading camera captured what appeared to be the same silver Honda Accord with temporary “Enterprise car sales” plates traveling just north of the Taco Bell at 7:07:04 a.m., approximately 40 seconds after WASHINGTON and his accomplice fled the Taco Bell:

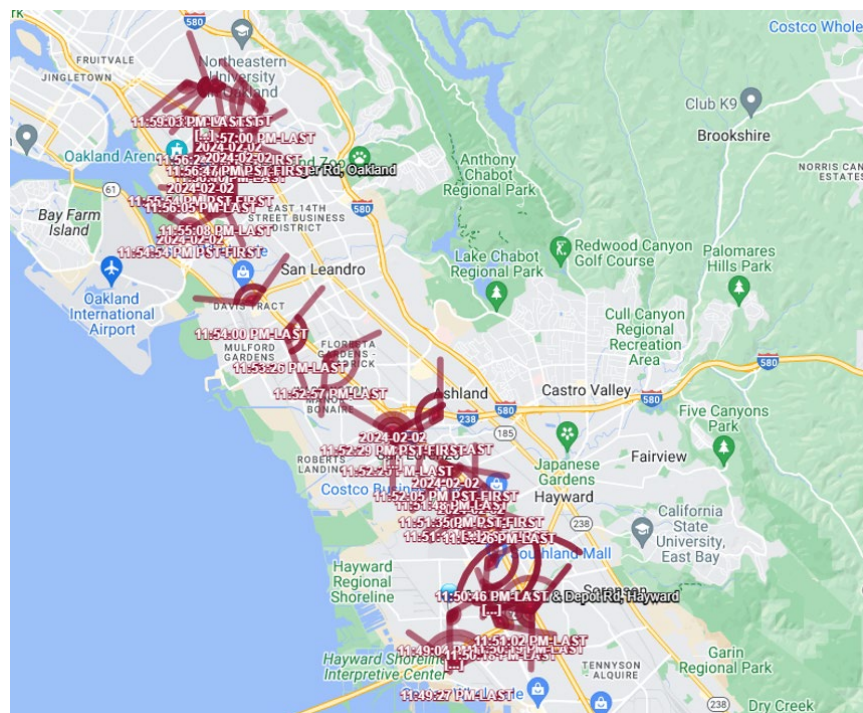


80. The CDRs for the phone number ending in 7170 indicated that from 6:45 a.m. to 6:50 a.m. on February 2, 2024, the phone was in the area of the I-880 and I-238 junction in San Lorenzo. From 6:50 to 6:52 a.m., the phone traveled eastbound and then connected to a cell tower close by the Taco Bell. Between 6:52 and 7:06 a.m., the phone remained connected to towers in the area. At 7:08 a.m., the phone was in the area of I-580, north of I-238 (approximately one mile north of the Taco Bell), which is consistent with the time, location, and direction indicated by the FLOCK camera images. The phone traveled in the direction of Oakland.

81. Around 11:50 p.m. that night, an officer with the Hayward Police Department—who had been briefed on the robbery at Taco Bell and the description of the suspects’ silver Honda Accord with “Enterprise” plates—canvassed the area of Industrial Boulevard and Depot Road in Hayward, after learning that the geolocation data for the phone ending in 7170 indicated

the phone was in the area. The officer saw a silver Honda with black paper plates with the word “Enterprise” parked and unoccupied near a storage facility. The officer continued to watch as a thin male, standing about 5’8” to 5’10 tall entered the driver’s seat. A lighter complected male of similar height entered the passenger seat. The silver Honda began to travel onto Depot Road and then southbound on Industrial Boulevard. When the officer’s marked patrol vehicle was approximately 30 feet behind the silver Honda, the officer activated his emergency lights and siren. The silver Honda accelerated and led the officer—and other Hayward Police Department units who joined the pursuit—on a high-speed chase, eventually entering I-92 and reaching speeds of 130 miles per hour. Officers eventually lost sight of the silver Honda at 75th Steet and Hegenberger Road in Oakland (almost 12 miles from the starting point of the chase).

82. Call detail records for the phone number ending 7170 placed the phone along the entire path of the car chase at the time it occurred:



**February 13, 2024: Investigators Locate the Pistol with Purple Lower following WASHINGTON’s Arrest**

83. After learning that WASHINGTON had been residing at his mother’s apartment

in Oakland, investigators authored and obtained a search warrant for the residence, as well as a warrant for WASHINGTON's arrest. On the morning of February 13, 2024, the United States Marshals Service Fugitive Apprehension Team executed the arrest warrant. WASHINGTON was present at the resident and attempted to flee by climbing to the apartment building's roof and then using ropes attached to the rooftop to descend the exterior wall, but he was ultimately apprehended. On his person, officers located the phone associated with the number ending 7170.

84. Investigators executed the search warrant inside the residence. Among other relevant items, investigators located a pistol with purple lower, which appeared consistent with the firearm used in the February 2, 2024 robbery at Taco Bell in Hayward. Given the uncommon appearance of this pistol, I believe this pistol is the same pistol possessed by WASHINGTON during the February 2, 2024 robbery at Taco Bell in Hayward:



***WASHINGTON's February 2, 2024 Robbery of Taco Bell Affected Interstate Commerce***

85. At the time of the robbery on February 2, 2024, Taco Bell was a national (and indeed, international) business, with restaurants located in different states across the country, as well as in foreign countries, that conducts interstate commercial transactions. Therefore, WASHINGTON's conduct interfered or affected interstate and/or foreign commerce.

**CONCLUSION**

86. Based on the information above, I submit that there is probable cause to believe that on or about February 2, 2024, WASHINGTON committed a robbery affecting interstate commerce, in violation of Title 18, United States Code, Section 1951 on or about February 2, 2024, in the Northern District of California.

*/s/ Jason S. Brissey*

Jason S. Brissey  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn before me by telephone in accordance with the requirements of Fed. R. Crim. P. 4.1 and 4(d) on this 1st day of July, 2024.

*Kandis Westmore*  
HONORABLE KANDIS A. WESTMORE  
U.S. Magistrate Judge